

January 28, 2025

**VIA ECF**

The Honorable Dale E. Ho  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Application GRANTED. The initial pretrial conference scheduled for February 4, 2025, and the associated January 30, 2025 deadline to submit a joint case management plan, are ADJOURNED sine die in light of the forthcoming stay request.

SO ORDERED.



Dale E. Ho  
United States District Judge

Dated: January 28, 2025  
New York, New York

**Re: *In re Zeta Global Holdings Corp. Stockholder Derivative Litigation*, Master File  
No.: 1:24-cv-09450-DEH-SDA - Request for Adjournment of Conference  
(This Document Relates to All Actions)**

Dear Judge Ho:

We represent Defendants David A. Steinberg, Christopher Greiner, John Sculley, Imran Khan, William Royan, Jené Elzie, William Landman, Robert Niehaus, and Jeanine Silberblatt (collectively, the “Individual Defendants”), and nominal Defendant Zeta Global Holdings Corp. (“Zeta,” and collectively with the Individual Defendants, “Defendants”) in the above-captioned action and write, jointly with Plaintiffs Ashraf Mostafa and Jae Hyung Jung (“Plaintiffs”), pursuant to Your Honor’s Individual Rule 2.e. regarding scheduling.<sup>1</sup>

The parties respectfully ask the Court to adjourn the initial pretrial conference scheduled for February 4, 2025, and the associated January 30, 2025 deadline to submit a joint case management plan *sine die*. The parties are currently negotiating a stipulation that would request the Court to stay the Consolidated Derivative Action in light of the related Securities Class Action. Accordingly, to conserve the Court’s time and resources, the parties respectfully ask the Court to adjourn the January 30, 2025 deadline to file a joint letter and proposed civil case management plan, as well as the initial pre-trial conference scheduled for February 4, 2025, to allow the parties to finalize their request that the case be stayed, and to submit it for the Court’s consideration and approval. In addition, pursuant to Your Honor’s Individual Rule 2.e.v., the parties will propose agreed-upon alternative conference dates in the event that the parties fail to reach an agreement, or if the Court declines to stay the Consolidated Derivative Action.

This is the first time that the parties have requested an adjournment of the initial pretrial conference date.

We appreciate the Court’s consideration of this matter.

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<sup>1</sup> On January 2, 2025, the Court consolidated the *Mostafa* Action and the *Jung* Action because they contain substantially similar factual and legal contentions (the “Consolidated Derivative Action”), see 1:24-cv-09450-DEH, ECF No. 12; 1:24-cv-09907-DEH, ECF No. 9. Both actions are related to *Davoodi v. Zeta Global Holdings Corp.*, 1:24-cv-08961-DEH-SDA (the “Securities Class Action”).

Respectfully submitted,

/s/ Timothy Brown

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cc: All Counsel of Record (via ECF)

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<sup>2</sup> Defendants use electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.